

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
600 Montgomery Street, Suite 3100  
San Francisco, CA 94111-2806  
Telephone: 415.659.2600  
Facsimile: 415.659.2601  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
David J. Richardson (SBN 168592)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

David B. Rivkin, Jr. (*pro hac vice*)  
BAKER & HOSTETLER LLP  
1050 Connecticut Ave., N.W., Suite 1100  
Washington, D.C. 20036  
Telephone: 202.861.1731  
Facsimile: 202.861.1783  
Email: drivkin@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF ERIC GOODMAN  
IN SUPPORT OF REPLY IN SUPPORT  
OF OMNIBUS OBJECTION TO  
CLAIMS FILED BY CALIFORNIA  
GOVERNOR'S OFFICE OF  
EMERGENCY SERVICES**

Eric Goodman declares as follows under penalty of perjury:

1. I am a Partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort Claimants (the "TCC") in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company. I have personal knowledge of the facts stated herein except as to matters where I indicate otherwise, and as to those matters, I believe them to be true. If called upon to testify, I could and would competently do so.

2. I make this declaration in support of the TCC's *Reply in Support of Omnibus Objection to Claims Filed by California Governor's Office of Emergency Services* (the "Reply") filed concurrently herewith.

3. For the Court's reference in its consideration of the Reply, attached hereto as **Exhibit 1** through **Exhibit 7** are true and accurate copies of the discovery requests and discovery responses referenced in the Reply:

1	<i>Official Committee of Tort Claimants' First Set of Requests for Admission to California Governor's Office of Emergency Services</i> , dated December 19, 2019.
2	<i>Official Committee of Tort Claimants' First Set of Interrogatories to California Governor's Office of Emergency Services</i> , dated December 19, 2019.
3	<i>Official Committee of Tort Claimants' Second Set of Requests for Admission to California Governor's Office of Emergency Services</i> , dated February 6, 2020.
4	<i>California Governor's Office of Emergency Services Response to Official Committee of Tort Claimants' First Set of Requests for Admission</i> , dated January 20, 2020.
5	<i>California Governor's Office of Emergency Services Response to Official Committee of Tort Claimants' First Set of Interrogatories</i> , dated January 20, 2020.
6	<i>California Governor's Office of Emergency Services Response to Official Committee of Tort Claimants' Second Set of Requests for Admission</i> , dated February 6, 2020.
7	<i>Official Committee of Tort Claimants' Responses to California Governor's Office of Emergency Services' First Set of Requests for Admission to the Official Committee of Tort Claimants</i> , dated January 31, 2020.

4. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of February 2020, at Cleveland, Ohio.



Eric Goodman